

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF APPEALS

In re Patent Application of:)	
CONCILIO ET AL.)	
)	Examiner: F. Almatrahi
Serial No. 10/725,193)	
)	Art Unit: 3627
Filing Date: December 1, 2003)	
)	
For: METHOD FOR THE DECOMPOSITION)	
IN MODULES OF SMART-CARD)	
EVENT-DRIVEN APPLICATIONS)	
_____)	

APPELLANT'S APPEAL BRIEF

MS Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Submitted herewith is Appellants' Appeal Brief together with the requisite \$540.00 large entity fee for filing a brief. If any additional extension and/or fee is required, authorization is given to charge Deposit Account No. **01-0484**.

(1) Real Party in Interest

The real party in interest is INCARD SA, assignee of the present application as recorded at reel 018832, frame 0745.

(2) Related Appeals and Interferences

At present there are no related appeals or interferences.

(3) Status of the Claims

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Claims 16-41 and 43 are pending in the application. Claim 42 has been withdrawn from consideration. Claims 1-15 have been cancelled. The Examiner's rejection of Claims 16-41 and 43 is being appealed herein.

(4) Status of the Amendments

All amendments have been entered and there are no further pending amendments. A copy of the claims involved in this appeal is attached hereto as Appendix A.

(5) Summary of the Claimed Subject Matter

Independent Claim 16 recites a method for executing an event-driven application in an electronic device including a smart-card, the application being resident in the smart-card and being decomposed into a central module **5** and at least one complementary module **6** (see paragraph 29 and FIG. 4, reproduced below for the Board's convenience). Independent method Claim 16 includes managing interaction between the modules by a framework **4** of the smart-card (see paragraph 30 and FIG. 4). After at least beginning execution of the central module **5** by the framework **4** based upon an external event, a new set of internal events is generated by the framework for managing the at least one complementary module **6** (see paragraphs 32-35 and FIG. 4).

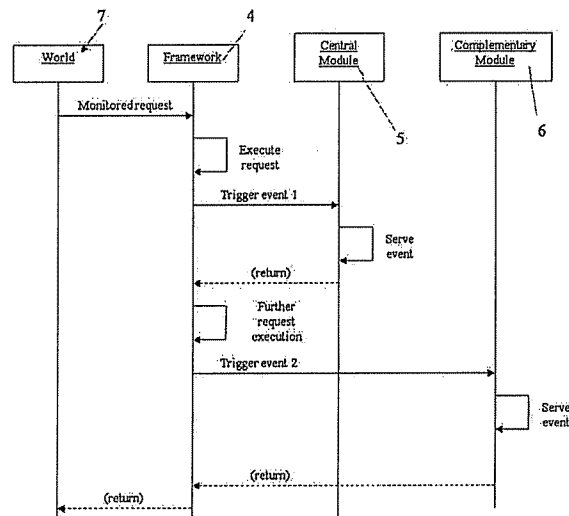


FIG. 4

Dependent Claim 17 recites that the framework 4 generates the new set of internal events after completing execution of the central module 5 (see paragraphs 32-33 and FIG. 4).

Dependent Claim 18 recites that the framework 4 generates the new set of internal events after completion of a remaining framework event-related task by the central module 5 (see paragraphs 32-33 and FIG. 4).

Dependent Claim 19 recites that the at least one complementary module 6 is registered and triggered based upon a new internal event (see paragraphs 32-35 and FIG. 4).

Dependent Claim 20 recites that an interface defined by the framework 4 is provided to the central module 5 and to the at

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least one complementary module **6** (see paragraph 33 and FIG. 4).

Dependent Claim 21 recites that input data delivered to the central module **5** is also delivered to the at least one complementary module **6** (see paragraph 35 and FIG. 4).

Dependent Claim 22 recites that the framework **4** comprises a fundamental module associated with an operating system of the smart-card (see paragraph 29 and FIG. 4).

Dependent Claim 23 recites that the fundamental module functions as a terminal interface protocol manager (see paragraphs 39-41 and FIG. 4).

Independent Claim 24 is directed to a method for executing an event-driven application resident in a smart-card comprising a fundamental module, the application being decomposed into a central module **5** and at least one complementary module **6** (see paragraph 29 and FIG. 4, reproduced above). The method comprises managing interaction between the central module **5** and the at least one complementary module **6** by the fundamental module (see paragraph 30 and FIG. 4). After at least beginning execution of the central module **5** by the fundamental module based upon an external event, an internal event is generated by the fundamental module for managing the at least one complementary module **6** (see paragraphs 32-35 and FIG. 4).

Dependent Claim 25 recites that the fundamental module generates the new internal event after completing execution of the central module **5** (see paragraphs 32-33 and FIG. 4).

Dependent Claim 26 recites that the fundamental module generates the new event after completion of a remaining fundamental module event-related task by the central module **5** (see paragraphs 32-33 and FIG. 4).

Dependent Claim 27 recites that the at least one complementary module **6** is registered and triggered based upon a

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new internal event (see paragraphs 32-35 and FIG. 4).

Dependent Claim 28 recites that an interface defined by the fundamental module is provided to the central module **5** and to the at least one complementary module **6** (see paragraph 33 and FIG. 4).

Dependent Claim 29 recites that input data delivered to the central module **5** is also delivered to the at least one complementary module **6** (see paragraph 35 and FIG. 4).

Dependent Claim 30 recites that the fundamental module is associated with an operating system of the smart-card (see paragraph 29).

Dependent Claim 31 recites that the fundamental module functions as a terminal interface protocol manager (see paragraphs 39-41).

Independent Claim 32 is directed to an electronic device comprising a smart card having an event-driven application resident therein, the application being separated into a central module **5** and at least one complementary module **6** (see paragraph 29 and FIG. 4, reproduced above). The smart card also comprises a framework **4** for managing interaction between the central module **5** and the at least one complementary module **6** (see paragraph 30 and FIG. 4). After at least beginning execution of the central module **5** by the framework **4** based upon an external event, generating a new internal event by the framework **4** for managing the at least one complementary module **6**. (see paragraphs 32-35 and FIG. 4).

Dependent Claim 33 recites that the framework **4** generates the new internal event after completing execution of the central module **5** (see paragraphs 32-33 and FIG. 4).

Dependent Claim 34 recites that framework **4** generates the new internal event after completing a remaining framework

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event-related task (see paragraphs 32-33 and FIG. 4).

Dependent Claim 35 recites that the at least one complementary module **6** is registered and triggered based upon a new internal event (see paragraphs 32-35 and FIG. 4).

Dependent Claim 36 recites that an interface defined by the framework **4** is provided to the central module **5** and to the at least one complementary module **6** (see paragraph 33 and FIG. 4).

Dependent Claim 37 recites that input data delivered to the central module **5** is also delivered to the at least one complementary module **6** (see paragraph 35 and FIG. 4).

Dependent Claim 38 recites that framework **4** comprises a fundamental module associated with an operating system of said smart-card (see paragraph 29 and FIG. 4).

Dependent Claim 39 recites that the fundamental module functions as a terminal interface protocol manager (see paragraphs 39-41).

Dependent Claim 40 recites that the smart card comprises first and second memories, that the central module **5** resides in the first memory, and that the at least one complementary module **6** resides in the second memory (see paragraph 36 and FIG. 4).

Dependent Claim 41 recites that the first memory comprises a read only memory and the second memory comprises a programmable memory (see paragraph 36 and FIG. 4).

Dependent Claim 43 recites that the electronic device is configured as a point of sale terminal (see paragraph 42).

(6) Grounds of Rejection to be Reviewed On Appeal

Claims 16-18, 20-26, 28-34, 36-41, and 43 stand rejected over the combination of Valencia et al. and Coutts et al. Claims 19, 27, and 35 stand rejected over the combination of

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Valencia et al., Coutts et al., and the Applicant's Admitted Prior Art.

(7) Argument

A. Independent Claims 16, 24, and 32 are Patentable Over Valencia et al. and Coutts et al.

The Examiner rejected independent Claims 16, 24, and 32 over the combination of Valencia et al. and Coutts et al. Valencia et al. discloses a system allowing paperless coupon redemption including a smart-card and a smart-card reader. The smart-card comprises a microcomputer and a memory coupled together through an address bus and a data bus. A CPU of the microcomputer is coupled to a timer through the data bus and an internal interrupt signal bus. Internal memories such as a read-only memory and a random access memory of the microcomputer are coupled through the address bus and the data bus to an interface for communication with the smart-card reader.

The Examiner correctly recognized that Valencia et al. fails to disclose after at least beginning execution of the central module by the framework based upon an external event, generating a new set of internal events by the framework for managing the at least one complementary module. In an attempt to provide this critical deficiency of Valencia et al., the Examiner looked to Coutts et al. Coutts et al. was cited as disclosing the generation of an internal event by a framework of a smart-card.

Even the selective combination of Valencia et al. and Coutts et al., however, fails to disclose all the features of independent Claim 16. The Examiner cited Valencia et al. as disclosing a method for executing an event-driven application in

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an electronic device including a smart-card, the application being resident in the smart-card and being decomposed into a central module and at least one complementary module. Valencia makes no such disclosure.

The Examiner cited FIG. 2, Col. 2, lines 59-62, and col. 4, lines 4-26 of Valencia et al. as disclosing these features. However, nowhere in these cited portions does Valencia et al. disclose an application resident in its smart card. In fact, Valencia et al. does not disclose an application resident in its smart card whatsoever. Rather, the smart card of Valencia et al. is used to store individual running balances attributed to particular manufacturers or retailers who offer discount coupons (see col. 9, lines 40-53). The smart card of Valencia et al. does not execute an application - it is merely used to store a database used by an application executed by a cash register.

Since Valencia fails to disclose an event-driven application resident in its smart card, it also fails to disclose that the application is decomposed into a central module and at least one complementary module.

Coutts et al. fails to provide these critical deficiencies of Valencia et al. Therefore the combination of Valencia et al. and Coutts et al. fails to disclose a method for executing an event-driven application in an electronic device including a smart-card, the application being resident in the smart-card and being decomposed into a central module and at least one complementary module.

The Examiner also cited Valencia et al. as disclosing managing interaction between the modules by a framework of the smart-card. Valencia et al. fails to disclose that its smart-card has a framework. Moreover, as discussed above, Valencia et al. fails to disclose any modules whatsoever. Accordingly, Valencia

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et al. also fails to disclose managing interaction between the modules by a framework of the smart-card. Coutts et al. fails to provide these critical deficiencies of Valencia et al. Therefore, the combination of Valencia and Coutts et al. fails to disclose managing interaction between the modules by a framework of the smart-card.

In addition, the Examiner cited Valencia et al. as disclosing after at least beginning execution of the central module by the framework based upon an external event, generating a new set of internal events by the framework for managing the at least one complementary module. As argued above, Valencia et al. fails to disclose the central module, the complementary module, and the framework. Valencia et al., and therefore the combination of Valencia et al. and Coutts et al., does not and can not disclose after at least beginning execution of the central module by the framework based upon an external event, generating a new set of internal events by the framework for managing the at least one complementary module.

The Examiner recognized that Valencia does not disclose an event generated being an internal event and cited to Coutts to provide this critical deficiency. However, the portion of Coutts et al. cited as disclosing the generation of an internal event by a framework of a smart-card (col. 12, lines 16-34) is actually directed to the generation of an internal event by an individual application module of an Automated Teller Machine. Valencia et al. fails to provide this critical deficiency of Coutts et al. Furthermore, Applicants submit that one of skill in the art, seeking to modify a method for executing an event-driven application resident in a smart-card, would simply not look to an application module of an Automated Teller Machine.

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In conclusion, the combination of Valencia et al. and Coutts et al. fails to disclose the features of independent Claim 16, which is therefore patentable. Independent Claims 24 and 32 contain similar recitations and are patentable for the same reasons.

B. Dependent Claims 17, 25, and 33 are Patentable Over Valencia et al. and Coutts et al.

The Examiner rejected dependent Claims 17, 25, and 33 over the combination of Valencia et al. and Coutts et al. As explained in detail above, the combination of Valencia et al. and Coutts et al. fails to disclose the features of independent Claims 16, 24, and 32, from which dependent Claims 17, 25, and 33 depend, respectively. For at least this reason, dependent Claims 17, 25, and 33 are patentable over the combination of Valencia et al. and Coutts et al.

As an independent basis for patentability, dependent Claim 17, for example, recites that the framework generates the new set of internal events after completing execution of the central module. Since neither Valencia et al. nor Coutts et al. discloses a framework, the generation of internal events thereby, or a central module (as explained above), the combination thereof does not and can not disclose generating a new set of internal events after completing execution of the central module. Accordingly, dependent Claim 17 is patentable over the combination of Valencia et al. and Coutts et al. Dependent Claims 25 and 33 contain similar recitations and are patentable for the same reason.

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C. Dependent Claims 18, 26, and 34 are Patentable Over Valencia et al. and Coutts et al.

The Examiner rejected dependent Claims 18, 26, and 34 over the combination of Valencia et al. and Coutts et al. As explained in detail above, the combination of Valencia et al. and Coutts et al. fails to disclose the features of independent Claims 16, 24, and 32, from which dependent Claims 18, 26, and 34 depend, respectively. For at least this reason, dependent Claims 18, 26, and 34 are patentable over the combination of Valencia et al. and Coutts et al.

As an independent basis for patentability, dependent Claim 18, for example, recites that the framework generates the new set of internal events after the completion of a remaining framework event-related task by the central module. Since neither Valencia et al. nor Coutts et al. discloses a framework, the generation of internal events thereby, or a central module (as explained above), the combination does not and can not disclose the generation of a new set of internal events after the completion of a remaining framework event-related task by the central module. Accordingly, dependent Claim 18 is patentable over the combination of Valencia et al. and Coutts et al. Dependent Claims 26 and 34 contain similar recitations and are patentable for the same reason.

D. Dependent Claims 19, 27, and 35 are Patentable Over Valencia et al., Coutts et al., and the Applicant's Admitted Prior Art.

The Examiner rejected dependent Claims 19, 27, and 35 over the combination of Valencia et al., Coutts et al., and the Applicant's Admitted Prior Art. As explained in detail above,

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independent Claims 16, 24, and 32, from which dependent Claims 18, 26, and 34 depend, respectively, are patentable. For at least this reason, dependent Claims 19, 27, and 35 are patentable over the combination of Valencia et al., Coutts et al., and the Applicant's Admitted Prior Art.

As an independent basis for patentability, dependent Claim 19 recites that the at least one complementary module is registered and triggered based upon a new internal event. The Examiner took the position that the Applicant's Admitted Prior Art (AAPA) discloses this feature. However, AAPA makes no disclosure. In sharp contrast to this claimed feature, AAPA discloses that the complementary module is registered and triggered based upon a new external event. Neither Valencia et al. nor Coutts et al. provides this critical deficiency. Accordingly, dependent Claim 19 is patentable over the combination of Valencia et al., Coutts et al., and the Applicant's Admitted Prior Art. Dependent Claims 27 and 35 contain similar recitations and are patentable for the same reason.

E. Dependent Claims 20, 28, and 36 are Patentable Over Valencia et al. and Coutts et al.

The Examiner rejected dependent Claims 20, 28, and 36 over the combination of Valencia et al. and Coutts et al. As explained in detail above, the combination of Valencia et al. and Coutts et al. fails to disclose the features of independent Claims 16, 24, and 32, from which dependent Claims 20, 28, and 36 depend, respectively. For at least this reason, dependent Claims 20, 28, and 36 are patentable over the combination of Valencia et al. and Coutts et al.

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As an independent basis of patentability, dependent Claim 20, for example, recites an interface defined by the framework is provided to the central module and to the at least one complementary module. The Examiner declared FIG. 2 of Valencia et al. to show this feature. While FIG. 2 of Valencia et al. shows a hardware interface coupled between an external terminal device and internal devices (cpu, ram, rom, timer, eeprom) of an IC card, Valencia et al. discloses no framework, no central module, and no complementary module (as explained above). Accordingly, the hardware interface shown in FIG. 2 of Valencia et al. does not correlate to the interface of dependent Claim 20. Coutts et al. fails to provide this critical deficiency to the combination. Accordingly, dependent Claim 20 is patentable over the combination of Valencia et al. and Coutts et al. Dependent Claims 28 and 36 contain similar recitations and are patentable for the same reason.

F. Dependent Claims 21, 29, and 37 are Patentable Over Valencia et al. and Coutts et al.

The Examiner rejected dependent Claims 21, 29, and 37 over the combination of Valencia et al. and Coutts et al. As explained in detail above, the combination of Valencia et al. and Coutts et al. fails to disclose the features of independent Claims 16, 24, and 32, from which dependent Claims 21, 29, and 37 depend, respectively. For at least this reason, dependent Claims 21, 29, and 37 are patentable over the combination of Valencia et al. and Coutts et al.

As an independent basis for patentability, dependent Claim 21, for example, recites that input data delivered to the central module is also delivered to the complementary module. The

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Examiner cited col. 4, lines 4-26 of Valencia et al. as disclosing this feature. The cited portion of Valencia et al., however, merely describes the internal hardware of an IC card and has nothing to do with a central module and a complementary of an application resident in a smart card. Moreover, Valencia et al. fails to describe a central module and a complementary module (as described above). Accordingly, Valencia et al. does not and cannot disclose that that input data delivered to a central module is also delivered to a complementary module. Coutts et al. fails to provide this critical deficiency. Thus, dependent Claim 21 is patentable over the combination of Valencia et al. and Coutts et al. Dependent Claims 29 and 37 contain similar recitations and are patentable for the same reason.

G. Dependent Claims 22, 30, and 38 are Patentable Over Valencia et al. and Coutts et al.

The Examiner rejected dependent Claims 22, 30, and 38 over the combination of Valencia et al. and Coutts et al. As explained in detail above, the combination of Valencia et al. and Coutts et al. fails to disclose the features of independent Claims 16, 24, and 32, from which dependent Claims 22, 30, and 38 depend, respectively. For at least this reason, dependent Claims 22, 30, and 38 are patentable over the combination of Valencia et al. and Coutts et al.

As an independent basis for patentability, dependent Claim 22, for example, recites that the framework comprises a fundamental module associated with an operating system of the smart-card. The Examiner cited col. 4, lines 4-26 of Valencia et al. as disclosing this feature. The cited portion of Valencia et al., however, merely describes the internal hardware of an IC

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card and has nothing to do with a framework, a fundamental module, or an operating system of a smart-card. Indeed, Valencia et al. fails to disclose a fundamental module or that its IC card runs an operating system whatsoever. Thus, Valencia et al. fails to disclose the above noted feature. Coutts et al. fails to provide these critical deficiencies. Thus, dependent Claim 22 is patentable over the combination of Valencia et al. and Coutts et al. Dependent Claims 30 and 38 contain similar recitations and are patentable for the same reason.

H. Dependent Claims 23, 31, and 39 are Patentable Over Valencia et al. and Coutts et al.

The Examiner rejected dependent Claims 23, 31, and 39 over the combination of Valencia et al. and Coutts et al. As explained in detail above, the combination of Valencia et al. and Coutts et al. fails to disclose the features of dependent Claims 22, 30, and 31, from which dependent Claims 23, 31, and 39 depend, respectively. For at least this reason, dependent Claims 23, 31, and 39 are patentable over the combination of Valencia et al. and Coutts et al.

As an independent basis for patentability, dependent Claim 23, for example, recites that the fundamental module functions as a terminal interface protocol manager. The Examiner cited col. 4, lines 4-26 of Valencia et al. as disclosing this feature. The cited portion of Valencia et al., however, merely describes the internal hardware of an IC card and has nothing to do with a fundamental module or a terminal interface protocol manager. Indeed, Valencia et al. fails to disclose a fundamental module or a terminal interface protocol manager whatsoever. Coutts et al. fails to provide these critical deficiencies.

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Therefore, dependent Claim 23 is patentable over the combination of Valencia et al. and Coutts et al. Dependent Claims 31 and 31 contain similar recitations and are patentable for the same reason.

I. Dependent Claim 40 is Patentable Over Valencia et al. and Coutts et al.

The Examiner rejected dependent Claim 40 over the combination of Valencia et al. and Coutts et al. As explained in detail above, the combination of Valencia et al. and Coutts et al. fails to disclose the features of independent Claim 32, from which dependent Claim 40 depends. For at least this reason, dependent Claim 40 is patentable over the combination of Valencia et al. and Coutts et al.

As an independent basis for patentability, dependent Claim 40 recites that the smart card comprises first and second memories and that the central module resides in the first memory and the complementary module resides in the second memory. The Examiner cited col. 4, lines 4-26 of Valencia et al. as disclosing this feature. The cited portion of Valencia et al., however, merely describes the internal hardware of an IC card and makes no disclosure whatsoever of any modules resident in the memories of the IC card. Coutts et al. fails to provide this critical deficiency. Accordingly, dependent Claim 40 is patentable over the combination of Valencia et al. and Coutts et al.

J. Dependent Claim 41 is Patentable Over Valencia et al. and Coutts et al.

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The Examiner rejected dependent Claim 41 over the combination of Valencia et al. and Coutts et al. As explained in detail above, the combination of Valencia et al. and Coutts et al. fails to disclose the features of dependent Claim 40, from which dependent Claim 41 depends. For at least this reason, dependent Claim 41 is patentable over the combination of Valencia et al. and Coutts et al.

K. Dependent Claim 43 is Patentable Over Valencia et al. and Coutts et al.

The Examiner rejected dependent Claim 43 over the combination of Valencia et al. and Coutts et al. As explained in detail above, the combination of Valencia et al. and Coutts et al. fails to disclose the features of independent Claim 32, from which dependent Claim 43 depends. For at least this reason, dependent Claim 43 is patentable over the combination of Valencia et al. and Coutts et al.

As an independent basis for patentability, dependent Claim 43 recites that the electronic device is configured as a point of sale terminal. The Examiner cited col. 4, lines 4-26 of Valencia et al. as disclosing this feature. The cited portion of Valencia et al., however, merely describes the internal hardware of an IC card and makes no disclosure whatsoever of a point of sale terminal. Applicant notes that Valencia et al. discloses a cash register, which may be considered to be a point of sale terminal. However, the Examiner correlated the IC card of Valencia et al. to the electronic device of independent Claim 32 (and therefore dependent Claim 43) and not the cash register of Valencia et al. Accordingly, Valencia et al. fails to disclose this feature. Coutts et al. also fails to provide this critical

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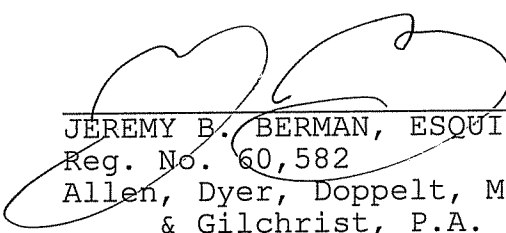
deficiency. The combination of Valencia et al. and Coutts et al. therefore fails to disclose the above noted claimed feature. Accordingly, dependent Claim 43 is patentable over the combination of Valencia et al. and Coutts et al.

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CONCLUSIONS

In view of the foregoing arguments, it is submitted that all of the claims are patentable over the prior art. Accordingly, the Board of Patent Appeals and Interferences is respectfully requested to reverse the earlier unfavorable decision by the Examiner.

Respectfully submitted,



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APPENDIX A - CLAIMS ON APPEAL
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Claims 1-15 (Cancelled).

16. (Previously Presented) A method for executing an event-driven application in an electronic device including a smart-card, the application being resident in the smart-card and being decomposed into a central module and at least one complementary module, the method comprising:

managing interaction between the modules by a framework of the smart-card; and

after at least beginning execution of the central module by the framework based upon an external event, generating a new set of internal events by the framework for managing the at least one complementary module.

17. (Previously Presented) A method according to Claim 16, wherein the framework generates the new set of internal events after completing execution of the central module.

18. (Previously Presented) A method according to Claim 16, wherein the framework generates the new set of internal events after completion of a remaining framework event-related task by the central module.

19. (Previously Presented) A method according to Claim 16, wherein the at least one complementary module is registered and triggered based upon a new internal event.

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20. (Previously Presented) A method according to Claim 16, wherein an interface defined by the framework is provided to the central module and to the at least one complementary module.

21. (Previously Presented) A method according to Claim 16, wherein input data delivered to the central module is also delivered to the at least one complementary module.

22. (Previously Presented) A method according to Claim 16, wherein the framework comprises a fundamental module associated with an operating system of the smart-card.

23. (Previously Presented) A method according to Claim 22, wherein the fundamental module functions as a terminal interface protocol manager.

24. (Previously Presented) A method for executing an event-driven application resident in a smart-card comprising a fundamental module, the application being separated into a central module and at least one complementary module, the method comprising:

managing interaction between the central module and the at least one complementary module by the fundamental module; and
after at least beginning execution of the central module by the fundamental module based upon an external event, generating a new internal event by the fundamental module for managing the at least one complementary module.

25. (Previously Presented) A method according to Claim 24, wherein the fundamental module generates the new internal event after completing execution of the central module.

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26. (Previously Presented) A method according to Claim 24, wherein the fundamental module generates the new event after completion of a remaining fundamental module event-related task by the central module.

27. (Previously Presented) A method according to Claim 24, wherein the at least one complementary module is registered and triggered based upon a new internal event.

28. (Previously Presented) A method according to Claim 24, wherein an interface defined by the fundamental module is provided to the central module and to the at least one complementary module.

29. (Previously Presented) A method according to Claim 24, wherein input data delivered to the central module is also delivered to the at least one complementary module.

30. (Previously Presented) A method according to Claim 24, wherein the fundamental module is associated with an operating system of the smart-card.

31. (Previously Presented) A method according to Claim 30, wherein the fundamental module functions as a terminal interface protocol manager.

32. (Previously Presented) An electronic device comprising:

a smart card having an event-driven application resident therein, the application being separated into a central

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module and at least one complementary module, said smart card also comprising a framework for

managing interaction between the central module and the at least one complementary module, and
after at least beginning execution of the central module by the framework based upon an external event, generating a new internal event by the framework for managing the at least one complementary module.

33. (Previously Presented) An electronic device according to Claim 32, wherein said framework generates the new internal event after completing execution of the central module.

34. (Previously Presented) An electronic device according to Claim 32, wherein said framework generates the new internal event after completing a remaining framework event-related task.

35. (Previously Presented) An electronic device according to Claim 32, wherein the at least one complementary module is registered and triggered based upon a new internal event.

36. (Previously Presented) An electronic device according to Claim 32, wherein an interface defined by said framework is provided to the central module and to the at least one complementary module.

37. (Previously Presented) An electronic device according to Claim 32, wherein input data delivered to the

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central module is also delivered to the at least one complementary module.

38. (Previously Presented) An electronic device according to Claim 32, wherein said framework comprises a fundamental module associated with an operating system of said smart-card.

39. (Previously Presented) An electronic device according to Claim 38, wherein said fundamental module functions as a terminal interface protocol manager.

40. (Previously Presented) An electronic device according to Claim 32, wherein said smart card comprises first and second memories; and wherein the central module resides in said first memory and the at least one complementary module resides in said second memory.

41. (Previously Presented) An electronic device according to Claim 40, wherein said first memory comprises a read only memory and said second memory comprises a programmable memory.

42. (Withdrawn) An electronic device according to Claim 32, wherein the electronic device is configured as a mobile telephone.

43. (Previously Presented) An electronic device according to Claim 32, wherein the electronic device is configured as a point of sale terminal.

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APPENDIX B - EVIDENCE APPENDIX
PURSUANT TO 37 C.F.R. § 41.37(c)(1)(ix)

None.

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APPENDIX C - RELATED PROCEEDINGS APPENDIX
PURSUANT TO 37 C.F.R. § 41.37(c)(1)(x)

None.